

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

IN THE MATTER OF:

MATTHEW STANDISH,
Debtor.

Chapter 7
Case No. 18-45101-TJT
Hon. Thomas J. Tucker

**DEBTOR'S RESPONSE TO TRUSTEE'S MOTION
FOR TURNOVER OF PROPERTY OF THE ESTATE**

Matthew Standish, by his attorneys, Gold, Lange & Majoros, P.C. responds to the Trustee's Motion for Turnover of Property of the Estate as follows:

1. Admits.
2. Admits.
3. Admits.
4. Admits.
5. Admits.
6. Admits that the reimbursement was not disclosed but denies the remaining allegations for lack of sufficient information.
7. Denies for lack of sufficient information. The debtor has retained new counsel and is in the process of correcting mistakes of prior counsel and intends to file amended Schedules A/B and C in the near future.
8. Admits that a request for turnover was made and that debtor expressed a desire to resolve the matter but denies the remaining allegations in paragraph 8 for lack of sufficient information.
9. Denies for lack of sufficient information.

10. Denies for lack of sufficient information.
11. Admits that 11 U.S.C. § 542(a) provides a remedy for turnover of property of the estate.
12. Admits.
13. Admits that the pending expense reimbursement is property of the estate but denies that all of it may be non-exempt.
14. Denies as untrue.

Respectfully submitted:

GOLD, LANGE & MAJOROS, P.C.

Dated: February 28, 2019

/s/ Elias T. Majoros

Attorney for Matthew Standish
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CERTIFICATE OF SERVICE

I hereby certify that on February 28, 2019, I electronically filed the *1) Debtor's Response to Trustee's Motion for Turnover of Property of the Estate, and 2) Certificate of Service* with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Office of the U.S. Trustee
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GOLD, LANGE & MAJOROS, P.C.

Dated: February 28, 2019

/s/ Elias T. Majoros

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